

1 Honorable John C. Coughenour
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

NOUSHIN ZARKESH,
Plaintiff,
vs.
VINMAR POLYMERS AMERICA, LLC
AND VINMAR INTERNATIONAL, LTD.,
Defendants.

Case No. 2:23-CV-01002-JCC

**[PROPOSED] ORDER GRANTING
JOINT STIPULATED MOTION FOR
EXTENSION OF TIME TO ANSWER
COMPLAINT**

Plaintiff Noushin Zarkesh (“Plaintiff”) and Defendants Vinmar Polymers America, LLC and Vinmar International, Ltd. (“Defendants”) have filed their Joint Stipulated Motion for Extension of Time for a 30-day extension of time for Defendants to answer, present defenses, or otherwise respond to Plaintiff Noushin Zarkesh’s (“Plaintiff”) Complaint following the November 21, 2023 Order directing the clerk re-open this matter the (“Complaint”) from December 5, 2023, until January 4, 2024.

IT IS HEREBY ORDERED that Defendant shall file its responsive pleading no later than January 4, 2024.

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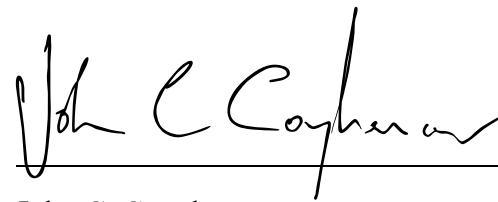
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[PROPOSED] ORDER GRANTING JOINT
STIPULATED MOTION FOR EXTENSION OF
TIME- 1
Case No. 2:23-cv-01002-JCC

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
1201 Third Avenue, Suite 5150 | Seattle, WA 98101
Phone: 206-693-7057 | Fax: 206-693-7058

1 DATED this 8th day of December 2023.
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John C. Coughenour
UNITED STATES DISTRICT JUDGE

1 Presented By:

2 OGLETREE, DEAKINS, NASH, SMOAK
3 & STEWART, P.C.

4 By: /s/ Laurence A. Shapero

5 By: /s/ Arianna L. Gardner

6 Laurence A. Shapero WSBA # 31301
7 Arianna L. Gardner, WSBA #57167
8 1201 Third Avenue, Suite 5150
9 Seattle, WA 98101
Telephone: (206) 876-5301
Facsimile: (206) 693-7058
Email: laurence.shapero@ogletree.com
arianna.gardner@ogletree.com

10 *Attorneys for Defendant*

11 Approved as to Form; Presentation Waived:

12 SEATTLE LITIGATION GROUP, PLLC

13 By: /s/ Steven B. Frank

14 By: /s/ Sean M. Phelan

15 By: /s/ Michael C. Subit

16 By: /s/ Ellicott K. Dandy

17 Steven B. Frank, WSBA #04944
18 Sean M. Phelan, WSBA #27866
19 Michael C. Subit, WSBA #29189
Ellicott K. Dandy, WSBA #57279
705 Second Avenue, Suite 1200
Seattle, WA 98104
Telephone: (206) 682-6711
Facsimile: (206) 682-0401
Email: sfrank@frankfreed.com
sphelan@frankfreed.com
msubit@frankfreed.com
edandy@frankfreed.com

20 *Attorneys for Plaintiff*

21 [PROPOSED] ORDER GRANTING JOINT
22 STIPULATED MOTION FOR EXTENSION OF
23 TIME TO ANSWER COMPLAINT- 3
24 Case No. 2:23-cv-01139-TMC

25 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
1201 Third Avenue, Suite 5150 | Seattle, WA 98101
26 Phone: 206-693-7057 | Fax: 206-693-7058

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2023, I served the foregoing [PROPOSED] ORDER GRANTING JOINT STIPULATED MOTION FOR EXTENSION OF TIME via the method(s) below to the following parties:

Steven B. Frank, WSBA #04944
Sean M. Phelan, WSBA #27866
Michael C. Subit, WSBA #29189
Ellicott K. Dandy, WSBA #57279
705 Second Avenue, Suite 1200
Seattle, WA 98104
Telephone: (206) 682-6711
Facsimile: (206) 682-0401
Email: sfrank@frankfreed.com
sphelan@frankfreed.com
msubit@frankfreed.com
edandy@frankfreed.com

Attorneys for Plaintiff

- by **electronic** means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
- by **mailing** a true and correct copy to the last known address of each person listed above. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the U.S. Postal Service in Seattle, Washington.
- by **e-mailing** a true and correct copy to the last known email address of each person listed above.

SIGNED THIS 8th day of December, 2023 at Seattle, Washington.

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.

By: /s/ Jordan Sheets

Jordan Sheets, Practice Assistant
jordan.sheets@ogletree.com